

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, DC 20554**

September 1999

DOCKET FILE COPY ORIGINAL

In the matter of

Admendment of CFR section 73.202  
of the Commissions rules

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**RECEIVED**

SEP 13 1999

**FCC MAIL ROOM**

**PETITION FOR RULEMAKING**

The following technical exhibit, and petition for Rulemaking, has been prepared for, and on behalf of, Clyde and Connie Lee Scott, D.B.A. EME Communications, 293 JC Saunders Road, Moultrie, Georgia 31768. The purpose is to request the assignment of channel 291A to Clinton, Tennessee as that cities third aural service.

Clinton is located in Anderson County Tennessee and is the county seat . Clinton is listed with the United States Census Department. As of 7/1/1998, The population of Anderson county, Tennessee was 71,116. The total population within the proposed 70 dBu contour is 121,363 persons. The total population within the 60 dBu contour is 455,872. This study clearly shows that the public interest would clearly be served by adding an additional service to 455,872 persons.

WSTEFM, Licensed to Toccoa, Georgia recently built, and has applied for license, to downgrade from a class C to C1 facility. With this downgrade the clear area to locate channel 291A is created for Clinton, TN. Exhibit-1 is a spacing study with the WSTEFM 291C site deleted from this study. This exhibit clearly shows that this channel can be allotted to Clinton without any additional interference to existing or proposed facilities and is in full compliance with CFR section 73.202 of the Commissions rules.

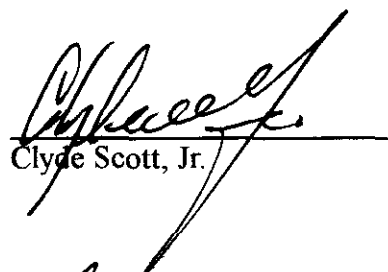
Exhibit-2 is a Digital-Line-Graph plot of the proposed 70 and 60 dBu Contours. This exhibit clearly shows that the proposed 70 dBu (3.16 mV/m) contour will completely encompass the city of Clinton, Tennessee. Exhibit-3 is the same study overlaid on a USGS topographic map.

No. of Copies rec'd 3  
List ABOVE

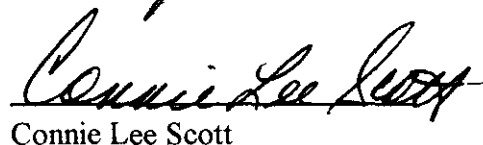
It is concluded that channel 291A can be assigned to Clinton, Tennessee in accordance with CFR section 73.207 of the Commissions rules, without any deleting or substitution within the present table of allotments, and therefore should be granted.

Once channel 291A is assigned to Clinton, Tennessee, Clyde and Connie Lee Scott, D.B.A. EME Communications, will file an application with the FCC, and once granted, will build and operate this facility within, and for, the people of Clinton, Anderson County, Tennessee.

Respectfully:



Clyde Scott, Jr.



Connie Lee Scott

EME Communications  
293 JC Saunders Road  
Moultrie, Georgia. 31768  
912-890-2506  
912-985-0864 (fax)

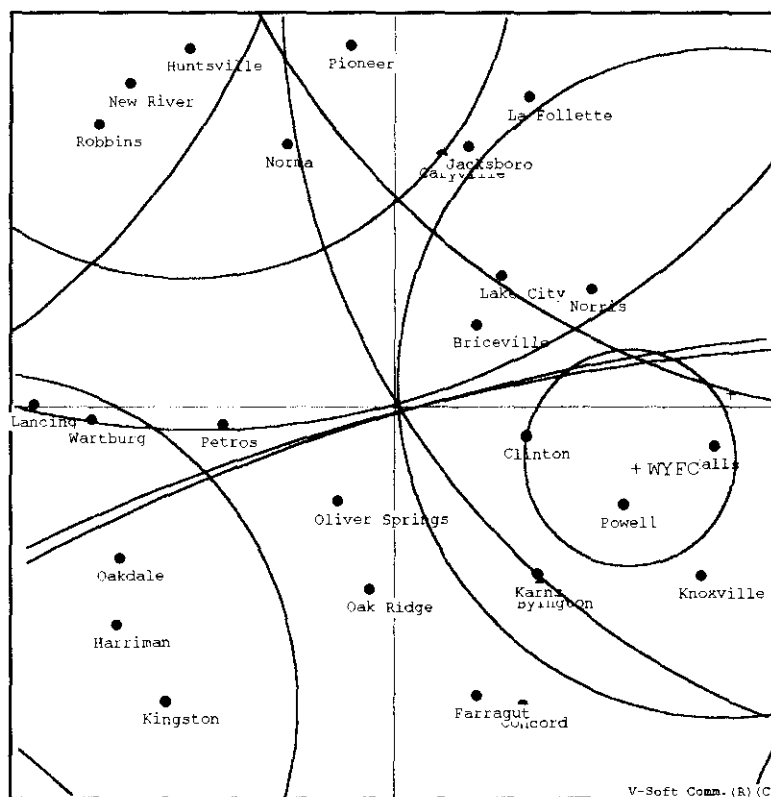
September 1999

CLINTON, TENNESSEE  
EXHIBIT - 1

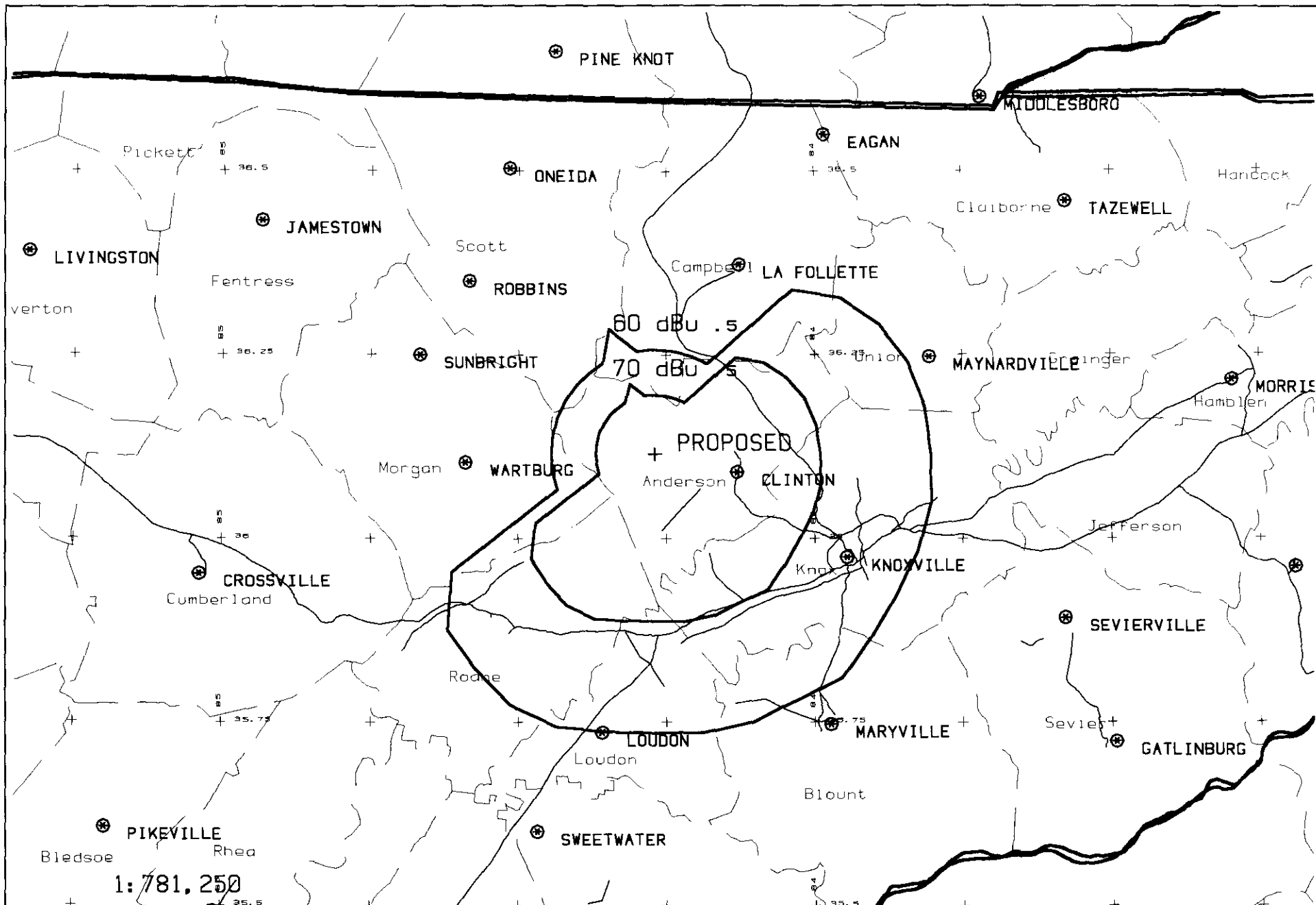
SEARCHFM™ LOCATE STUDY

Ch 291 A  
106.1 MHz

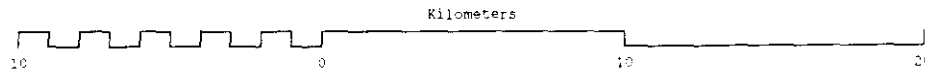
N. Lat. 36 06 54  
W. Lng. 84 16 10



Call	CH#	Location		D-KM	Azi	FCC	Margin
WHAY	290A	Whitley City	KY	72.25	345.2	72.0	0.25
ALOPEN	290A	Tazewell	TN	72.35	57.9	72.0	0.35
WXVO.C	294A	Norris	TN	31.36	85.9	31.0	0.36
WSTEFM	291C1	Toccoa	GA	200.49	165.6	200.0	0.49
AD291	291C1	Lawrenceville	GA	200.57	163.8	200.0	0.57
AD291	291C1	Sugar Hill	GA	200.57	163.8	200.0	0.57
WYFC	237A	Clinton	TN	22.81	101.9	10.0	12.81
WRIL.C	292A	Pineville	KY	87.05	35.1	72.0	15.05
WRIL	292A	Pineville	KY	87.06	35.2	72.0	15.06
WBNTFM	288A	Oneida	TN	47.17	335.3	31.0	16.17
WOFEFM	289A	Rockwood	TN	48.81	235.4	31.0	17.81
WANYFM	292A	Albany	KY	102.12	309.7	72.0	30.12
WSKZ	293C	Chattanooga	TN	142.17	222.1	95.0	47.17
WDLY	288A	Gatlinburg	TN	78.22	125.6	31.0	47.22
WNRQ	290C	Nashville	TN	232.52	268.6	165.0	67.52
WRZK.C	290C3	Colonial Heigh	TN	157.82	72.6	89.0	68.82
WJDT	293A	Rogersville	TN	102.29	72.8	31.0	71.29



<p>Scale in km</p> <p>0 10 20 30 40 50</p>	<p>PROPOSED 291A 6kW 550.05M AMSL</p> <p>N. Lat. 36 06 54 W. Lng. 84 16 10</p>	<p>CLINTON EXHIBIT-2</p> <p>EME Communications</p>
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CLINTON - 70dBU CONTOUR  
EXHIBIT-3

Center Latitude: 6-04-30.97  
Center Longitude: -12-05.51

**DECLARATION AND QUALIFICATIONS OF PREPARER**

STATE OF GEORGIA )  
CITY OF MOULTRIE )  
COLQUITT COUNTY )

ss:

CLYDE SCOTT, JR. ,UNDER PENALTY OF PREJURY, DECLARES AND SAYS  
HE IS A BROADCAST ENGINEER AND PRESIDENT OF EME COMMUNICATIONS.  
HE HAS BEEN ENGAGED TO PREPARE THE ATTACHED TECHNICAL EXHIBIT

THAT HIS QUALIFICATIONS ARE A MATTER OF RECORD BEFORE THE FEDERAL  
COMMUNICATIONS COMMISSION AND HAS BEEN ACTIVE IN THE BROADCAST  
INDUSTRY SINCE 1965 AND IN BROADCAST ENGINEERING SINCE 1972. THAT  
HE IS THE HOLDER OF GENERAL RADIOTELEPHONE LICNESE NO. PG-6-30133.

THAT THE ATTACHED TECHNICAL EXHIBIT WAS EITHER PREPARED BY HIM  
OR UNDER HIS DIRECT SUPERVISION. ALL MATERIAL AND EXHIBITS HERETO  
ARE BELIEVED TO BE TRUE AND CORRECT.

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CLYDE SCOTT, JR.